## REMARKS

Claims 1-25 are rejected. Please cancel Claim 12 without prejudice. Claims 1, 10, 13, and 19 are amended herein. No new matter is added as a result of the Claim amendments.

### 35 U.S.C. § 102 Rejections

Claims 1-25 are rejected under 35 U.S.C. 102(e) as being anticipated by Suzuki (6,529,188), hereinafter referred to as "Suzuki." The Applicants respectfully submit that the embodiments of the present invention recited in Claims 1, 10, and 19 are not taught or suggested by Suzuki. Claim 1 of the present invention recites,

> a digitizer comprising a layer of conductive paste disposed above a digitizing element; and
> a single-piece top cover enclosing said display device and said digitizer and operable to allow mechanical transfer of external pressure to cause said layer of conductive paste to contact and activate said digitizing element responsive to said external pressure, wherein a point of contact on said single-piece top cover is detected.

Independent Claims 10 and 19 recite similar Claim limitations. The Applicants respectfully submit that Suzuki does not teach or suggest that the silver paste cited in the rejection contacts and activates the digitizing element as a result of external pressure applied to the top cover. Instead, the silver paste in Suzuki's invention is a permanent electrical connection between connection points of two substrate layers and does not operate in accordance with the claimed embodiment above. For example, Suzuki states in column 11, lines 4-10,

> When the lower substrate 4B is laminated to the upper substrate 4A, connection points T1, T3 of the downside connection portions 53, 54 of the upper substrate 4A and connection points T2, T4 of the upside connection

portions 43, 44 of the lower substrate are electrically connected with each other through a conductive material preferably made of a silver paste.

Suzuki also states in column 11, line 67- column 12, lines 1-13:

> Here, connection points T1, T3 of the upper substrate 4A are respectively electrically connected with connection points T2, T4 of the lower substrate 4B using a silver paste. Due to such a constitution, the terminals Y1, Y2 and the terminals X1, X2 are respectively bridged to an upper common connection portion 41 of the upper substrate 4A and a lower common connection portion 42 of the lower substrate 4B so as to form detection terminals. Then, in the external circuit, based on a resistance value corresponding to a distance between contact points of the upper comb-shaped resistance film 51 and the lower comb-shaped resistance film 52 at an input point by pushing and respective common connection points, the coordinates (x, y) are detected.

Suzuki teaches this again in column 12, lines 28-31. As such, the Applicants respectfully submit that the cited silver paste of Suzuki comprises a permanent electrical connection between the upper and lower substrate layers. Suzuki further teaches that detection of a point of contact (e.g., by pen 560 upon upper substrate 4A) is performed by the comb-shaped resistance films 51 and 52. In other words, external pressure upon the top cover does not cause the silver paste of Suzuki to contact and activate the digitizing element as recited in Claims 1, 10, and 19. Therefore, the Applicants respectfully submit that the embodiments of the present invention recited in Claims 1, 10, and 19 are not described or suggested by Suzuki.

The Applicants further submit that Suzuki teaches away from the present invention as claimed according to the passage in column 7, lines 41-47:

> In the same manner as the constitution shown in FIG. 14A and FIG 14B, on inner surfaces of an upper substrate 4A made of polyethylene terephthalate (PET) and a lower substrate 4B made of glass, an upper resistance film 11 and a lower resistance film 12 made of indium tin oxide (ITO) are respectively formed by coating.

Suzuki furthr teaches in column 10, lines 48-62:

> "The upper substrate 4A is constituted such that on a whole inner surface of a soft film made of polyethylene terephthalate (PET) film, the resistance film 11 preferably made of indium tin oxide (ITO) is formed in a planar manner.
>
> Similarly, the lower substrate 4B is constituted such that on a whole inner surface of a hard substrate preferably made of glass, the resistance film 22 preferably made of ITO is formed in a planar manner.

Thus, the detection elements taught by Suzuki comprise resistance films (e.g., resistance film 11 and 22) made of indium tin oxide that come into contact with each other. Claims 1, 10, and 19 of the present invention recite that, responsive to external pressure, a layer of flexible conductive paste contacts the digitizing element, thus registering the point of contact upon the cover.

Claim 1 of the present invention recites a layer of flexible conductive paste disposed above a digitizing element and which activates the digitizing element in response to external pressure applied to a top cover of an electronic device. Claims 10 and 19 of the present invention similarly recited that contact between the digitizing element and the conductive paste is registered in response to mechanical transfer of pressure upon a top cover. The Applicants respectfully submit that Suzuki does not teach or describe the above Claim limitations. Therefore, the Applicants respectfully submit that the rejection of Claims 1, 10, and 19 of the present invention under 35 U.S.C. § 102(e) has been overcome.

The Applicants respectfully submit that Suzuki does not anticipate the embodiments of the present invention recited in Claims 2-9, 11, 13-18, and 20-25 as

these Claims are dependent on allowable base Claims and recite additional limitations. Accordingly, the Applicants respectfully assert that the rejection of Claims 2-9, 11, 13-18, and 20-25 under 35 U.S.C. § 102(e) has been overcome.

## CONCLUSION

Based on the arguments presented above, the Applicants respectfully assert that Claims 1-25 overcome the rejections of record and, therefore, the Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,
WAGNER, MURABITO & HAO LLP

Date: 11/5/2003

Anthony C. Murabito
Reg. No. 35,295

Two North Market Street
Third Floor
San Jose, California 95113
(408) 938-9060